

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION**

CONSUMER FINANCIAL
PROTECTION BUREAU,

Plaintiff,

v.

UNIVERSAL DEBT & PAYMENT
SOLUTIONS, LLC; *et al.*

Defendants.

Civil Action No.
1:15-CV-0859-RWS

**MOTION OF CONSUMER FINANCIAL PROTECTION BUREAU
FOR APPOINTMENT OF A RECEIVER**

Pursuant to Rule 66 of the Federal Rules of Civil Procedure, Plaintiff, the Consumer Financial Protection Bureau, hereby moves for an order appointing an independent receiver over Defendants Check & Credit Recovery, LLC, Credit Power, LLC, Universal Debt & Payment Solutions, LLC, Universal Debt Solutions, LLC, WNY Account Solutions, LLC, WNY Solutions Group, LLC, and two entities wholly owned by certain other Defendants, Real Estate of Distinction, Inc., and Rx Office Solutions, LLC.

This Motion is supported by a brief, exhibits to the brief, and a proposed order.

Dated: November 21, 2019

Respectfully Submitted,

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Acting Enforcement Director

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Deputy Enforcement Director

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/s/ Mary K. Warren

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this day a true and correct copy of the foregoing document was filed with the clerk of court using the CM/ECF system, which will automatically send email notification of the filing to all attorneys of record, and was mailed by United Parcel Service to the following defendants that do not have access to the CM/ECF system:

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/s/ Mary K. Warren
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November 21, 2019